

1 L. Scott Oliver (SBN 174824)
2 scott.oliver@klgates.com
Ranjini Acharya (SBN 290877)
ranjini.acharya@klgates.com

3 K&L GATES LLP
4 630 Hansen Way
Palo Alto, CA 94304
5 Telephone: (650) 798-6700
Facsimile: (650) 798-6701

6 Attorneys for Plaintiff INNOVATIVE
7 HEALTH SOLUTIONS, INC.

8 [Additional Counsel Listed on Signature Page]

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 INNOVATIVE HEALTH SOLUTIONS, INC.

14 Plaintiff,

15 vs.
16 DYANSYS, INC., a California corporation,
SRINI NAGESHWAR, individually,
17 PRODUCTS FOR DOCTORS, INC., a California
corporation, and JAMES BRADFORD,
individually,

18 Defendants.

19 Case No. 3:14-cv-05207-SI

20
21 **STIPULATION OF DISMISSAL AND**
~~[PROPOSED]~~ ORDER

1 WHEREAS, Plaintiff Innovative Health Solutions, Inc. filed its Third Amended Complaint on
2 June 5, 2015;

3 WHEREAS, Plaintiff and Defendants Dyansys, Inc., Srini Nageshwar, Products for Doctors,
4 Inc. and James Bradford, settled this matter on or about October 21, 2015;

5 NOW, THEREFORE, Plaintiff hereby gives notice of dismissal of all of Plaintiff's claims for
6 relief against Defendants with prejudice, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). Plaintiff and
7 Defendants, through their attorneys of record, hereby stipulate to the dismissal, and agree that each
8 party is to bear its own attorneys' fees, expenses and costs.

9

10 **IT IS SO STIPULATED.**

11

12 Dated: November 2, 2015

Respectfully submitted,

13 By:

14 /s/ Ranjini Acharya

15 L. Scott Oliver (SBN 174824)
scott.oliver@klgates.com
Ranjini Acharya (SBN 290877)
ranjini.acharya@klgates.com

16
17 K&L GATES LLP
630 Hansen Way
Palo Alto, CA 94304
Telephone: (650) 798-6700
Facsimile: (650) 798-6701

18
19 Matthew S. Nelles (*admitted pro hac vice*)
mnelles@broadandcassel.com
BROAD AND CASSEL
One Financial Plaza
100 S.R. 3rd Avenue, Suite 2700
Ft. Lauderdale, FL 33394
Telephone: (954) 764-7060
Facsimile: (954) 761-8135

20
21
22
23
24
25
26
27
28
Lacey DeLori Corona (*admitted pro hac vice*)
lcorona@broadandcassel.com
BROAD AND CASSEL
4100 Legendary Drive, Suite 280
Destin, FL 32541
Telephone: (850) 269-0148
Facsimile: (850) 521-1452

Attorneys for Plaintiff INNOVATIVE
HEALTH SOLUTIONS, INC.

1 Dated: November 2, 2015

2 By: /s/ Bryon J. Benevento
3 Patricia Anne Welch
4 welch.patricia@dorsey.com
5 DORSEY & WHITNEY LLP
6 305 Lytton Avenue
7 Palo Alto, CA 94301
8 Telephone: (650) 857-1717
9 Facsimile: (650) 857-1288

10 Bryon J. Benevento (*admitted pro hac vice*)
11 benevento.bryon@dorsey.com
12 DORSEY & WHITNEY LLP
13 51 West 52nd Street
14 New York, New York
15 Telephone: (212) 415-9200
16 Facsimile: (212) 953-7201

17 Kimberly Neville (*admitted pro hac vice*)
18 neville.kimberly@dorsey.com
19 DORSEY & WHITNEY LLP
20 136 S. Main Street, Suite 1000
21 Salt Lake City, UT 84101-1685
22 Telephone: (801) 933-7360
23 Facsimile: (801) 933-7373

24 Attorneys for Defendants DYANSYS, INC.,
25 and SRINI NAGESHWAR.

26 Dated: November 2, 2015

27 By: /s/ Thomas Stefan Gruenbeck
28 Thomas Stefan Gruenbeck (SBN 177056)
tom@gruenbeckvogeler.com
Gruenbeck Vogeler
23120 Alicia Pkwy

29 Suite 223
30 Mission Viejo, CA 92692
31 Telephone: 949-453-1874
32 Facsimile: 949-453-8175

33 Attorneys for Defendants PRODUCTS FOR
34 DOCTORS, INC. and JAMES BRADFORD

35 **CERTIFICATION PURSUANT TO CIV. L.R. 5-1(i)(3)**

36 Pursuant to Civil Local Rule 5-1(i)(3), I hereby certify that concurrence in the filing of this
37 document has been obtained from the signatories for whom a signature is indicated by a conformed
38 signature (/s/). I have on file records to support this concurrence for production for the Court if so
39 ordered.

40 Dated: November 2, 2015

41 /s/ Ranjini Acharya
42 Ranjini Acharya

1 **[PROPOSED] ORDER OF DISMISSAL**
2
3

The above STIPULATION OF DISMISSAL is approved. The above-captioned action is
dismissed with prejudice, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii).

4
5 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**
6

7 Dated: 11/3/15
8

By:

Susan Illston

9 United States District Court Judge
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28